

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JULIE CHRISLEY, individually and in her capacity as the majority owner of CHRISLEY ASSET MANAGEMENT, LLC, :
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:
:
Plaintiff, :
:
:
v. : **Civil Action No.**
:
MARK BRADDOCK, KEY ASSET SOLUTIONS, LLC, ALINA CLERIE, and ARC AUTO BROKERS, LLC, :
:
:
Defendants. :

DEFENDANTS' SUPPLEMENTAL REPLY IN SUPPORT OF THEIR MOTIONS TO DISMISS

Defendants do not dispute Plaintiff's restatement of the black-letter law concerning the motion to dismiss standard. Defendants did not, however, file their motions to dismiss as a mechanical matter of course as Plaintiff suggests. Instead, the "peculiar" manner (to borrow Plaintiff's characterization)¹ in which Plaintiff has pursued her otherwise straightforward business dispute makes this case uniquely ripe for pre-discovery disposition. Judge Land's admonition concerning

¹ Pl.'s Supp. Resp. to Kimberly A. Childs' Amended Mot. for Sanctions, Sept. 30, 2013, ECF No. 117.

ill-conceived motions to dismiss in other cases is immaterial to the situation at hand.

As set forth in Defendants' original motions, and confirmed in Plaintiff's opposition briefs and Defendants' replies, Plaintiff has failed, for multiple reasons, to meet the *Twombly-Iqubal* standard or otherwise adequately plead her claims. Dismissal pursuant to Rule 12(b)(6) is appropriate and warranted.

October 2, 2013.

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CERTIFICATE OF FONT

This is to certify that the within and foregoing pleading has been prepared using Times New Roman, 14 point, font which has been approved by the Court in L.R. 5.1C.

/s/ Todd Stanton
Todd Stanton

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Plaintiff,	:	
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v.	:	Civil Action No.
	:	1:12-cv-03524-CAP
MARK BRADDOCK, KEY ASSET SOLUTIONS, LLC, ALINA CLERIE, and ARC AUTO BROKERS, LLC,	:	
	:	
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the within and foregoing **DEFENDANTS' SUPPLEMENTAL REPLY IN SUPPORT OF THEIR MOTIONS TO DISMISS** upon all parties to this matter via CM/ECF.

October 2, 2013.

/s/ Todd Stanton
Todd Stanton